UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

May 15, 1996

MEMORANDUM

SUBJECT: Explanation of Significant Differences for the Idaho Pole Company Site

FROM: Jim Harris, 8MO
Remedial Project Manager

TO: Jack W. McGraw
Acting Regional Administrator

Attached is an Explanation of Significant Differences (ESD) for the Idaho Pole Company (IPC) Superfund Site located in Bozeman, Montana for your signature. The purpose of the ESD is to explain modifications to the remedy for the site that have been identified as the result of the Remedial Design process.

The ROD for the IPC Site contains descriptions of the soil and ground water components of the remedy. The Remedial Design process for the soil and ground water components of the remedy, which began after EPA issued the ROD, has identified the following changes to the remedies:

Soil Remedy

- Hot Water/Steam will not be used for flushing the inaccessible areas under the pole plant facility and I-90. Ambient temperature water will be used for flushing inaccessible areas.

- Additional excavation and treatment of soils from under Cedar Street and from the pole plant facility to the levels required in the ROD will take place.

- Sediments in the Substation Ditch will not be excavated because they do not exceed cleanup levels.

- The Land Treatment Unit (LTU) will be located in the southeast corner of the Plant and will receive all of the excavated soil. Soil will be treated in one foot lifts and will be used for backfill on-site when pentachlorophenol (PCP) and polycyclic aromatic hydrocarbon (PAH) cleanup levels have been reached.

Ground Water Remedy

- The soil flushing component for the inaccessible areas of the site will be designed with the ground water remedy.

- Granular Activated Carbon (GAC) treatment will be used in place of biological treatment.

- The ground water treatment system will be designed to enhance *in-situ* biological degradation and to control contaminant migration in a phased manner. The first phase will be installed in the Plant and areas south of I-90. Phase II will consist of an evaluation of Phase I and adjustments to the system to optimize ground water remediation. Possible adjustments could include additional wells for extraction and injection on either side of I-90. The cleanup objectives identified in the ROD will not change.

Concurrence List: R. Fox, 8MO
J. Wardell, 8MO
S. Bohan, 8RC
M. Dodson, 8EPR

Attachments:
FCD:May 14, 1996:jimh:esdcon.cur

CONCURRENCE COPY

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8MO Harris 5/15/96
8MO Ford 5/15/96
8MO Engfer Wendell 5/15/96
8ENF-L Sabol 5/20/96
8ENF-L Bruner 5/20/96
8EPR CL for Dodson 5/21/96

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Concurrence List: R. Fox, 8MO R.L. Fox 5/15/96
J. Wardell, 8MO Eric for Wardell 5/15/96
S. Bohan, 8RC SAB 5/20/96
M. Dodson, 8EPR

Attachments: